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Attorneys for Defendant
**AMERICAN HOME SHIELD
CORPORATION**

Attorneys for Defendant
**AMERICAN HOME SHIELD
CORPORATION**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERIN ROBERTSON, on behalf of herself and
other similarly situated,

Plaintiff,

v.

AMERICAN HOME SHIELD
CORPORATION, a Delaware corporation.

Defendant.

CASE NO. 2:24-cv-01571-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT –
CLASS ACTION**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff Erin Robertson, on behalf of herself and other similarly situated, and Defendant American Home Shield Corporation, and pending the Court's approval, that Defendant shall have additional thirty (30) days to answer or otherwise respond to the Complaint (ECF No. 1) filed in this matter. Defendant's original response deadline is September 19, 2024. With the requested thirty (30) day extension, Defendant's deadline to answer or otherwise respond to the Complaint is extended to October 21, 2024 (as the 30th day is a Saturday, the requested new deadline is the next available business day).

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1 Good cause exists for the extension set forth herein. Defense counsel were only recently
2 retained in this matter and require additional time to review and respond to Plaintiff's allegations
3 and streamline any potential motions that may be presented to the Court.

4 This is the first request for an extension of time for Defendant to respond to the Complaint.
5 This request is made in good faith and is not intended for purposes of delay.

6 Respectfully submitted,

7 Dated: September 16, 2024

Dated: September 16, 2024.

8 DICKINSON WRIGHT PLLC

SMITH KRIVOSHEY, PC

9 /s/ Michael N. Feder

/s/ Aleksandr "Sasha" Litvinov

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23 ERIN ROBERTSON, on behalf of herself and
24 other similarly situated

25 **IT IS SO ORDERED:**

26 
27 UNITED STATES MAGISTRATE JUDGE

28 Dated: September 16, 2024

CASE NO.: 2:24-cv-01571-RFB-EJY